

**WRTI Comments Regarding:
FCC Further Notice of Proposed Rulemaking on Digital Radio
(MM Docket No. 99-325)**

1. Will authorization of supplemental audio channel capability encourage your station to convert to digital broadcasting?

Absolutely. The approval of the supplemental audio channel expands our opportunity for public service by allowing us to meet underserved listener needs. While HD Radio in general delivers an enhanced listener experience via metadata and audio quality, use of the supplemental audio channel directly translates into cost-effectively doubling our core service—a historical opportunity. As a mission based station, WRTI would place the highest priority on converting to HD Radio should the supplemental audio channel be approved.

2. How will your station use the supplemental audio channel?

WRTI will double its current programming from 12 hours a day of jazz and classical music each to 24 hours a day of each.

3. Explain how a supplemental audio channel will allow your station to improve and expand services to current and new audiences. Does the availability of an additional audio programming channel enhance local offerings and encourage programming and audience diversity?

WRTI's current split format of 12 hours a day of classical music and 12 hours a day of jazz music is either an exclusive or primary service throughout our coverage area. Doubling this programming not only expands the total hours of music available to current listeners, but also allows us to program a broader selection of music, thereby gaining those listeners who left radio due to our limited number of hours available for broader programming. Additionally, we expect to retain a greater number of current listeners for more hours of listening per week, increasing our average time spent listening.

Jazz and classical music are both music formats in which the audience demands a tremendous amount of information about the artists, composer, and performance details of recordings. HD Radio will allow WRTI to deliver this information not only via voice but also as text that will be displayed on the listener's receiver. This information is one of the most frequent requests from listeners. Furthermore, by having 24 full hours of classical and of jazz, WRTI will be freer to present a wider spectrum of classical and jazz music—again, one of the most requested services from our listeners.

WRTI originates the vast majority of its programming, which includes a significant presence for local and regional performing groups. Our current format limits our ability to broadcast area jazz events during classical programming and vice versa. The availability of additional programming

hours in the day means that we will be able to cover and broadcast more community events more often, regardless of their time of day.

4. What local community groups or organizations could benefit from supplemental audio channel authorization and support your use of this capability?

WRTI works with over 100 organizations a year to broadcast news of concerts, workshops, and other arts events. We also develop a significant number of special programs around these organizations. This programming creates the opportunity to seek additional support from underwriters and private contributors. With the additional hours available to us, it means we can produce more special programming that would appeal to current and new supporters for sponsorship.

5. What regulatory steps will best support the FCC's goal of fostering and protecting public service programming?

Beyond authorizing the use of HD Radio technology to offer supplemental audio channels, the FCC's goals will be well served by providing non-commercial educational stations such as WRTI, with maximum flexibility to serve the needs and interests of our listeners. WRTI and other public radio stations share a mission to serve the public's educational needs and have a proven track record of successfully doing so. Public radio counts on the FCC to fully protect our ability to serve that programming mission. We also have a tremendous need to fund this mission. The potential use of SAC technology for remunerative purposes will strengthen our ability to continue to serve the public better into the future.